

JACKSON LEWIS P.C.  
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ATTORNEYS FOR DEFENDANTS,  
RUTGERS, THE STATE UNIVERSITY OF NEW JERSEY  
and BARRY LEVIN, M.D.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

JENNIFER MICHAELS, M.D.,

Plaintiff,

vs.

RUTGERS UNIVERSITY NEW JERSEY  
MEDICAL SCHOOL and BARRY LEVIN,  
M.D., individually,

Defendants.

Civil Action No.: 2:15-cv-07603-JXN-CLW

**NOTICE OF MOTION TO ENFORCE  
SETTLEMENT**

**Return Date: April 1, 2024**

**Oral Argument Requested**

TO: Neil Cartusciello, Esq.  
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Attorneys for Plaintiff

**PLEASE TAKE NOTICE** that on Monday, April 1, 2024, at 10:00 a.m. or as soon thereafter as counsel may be heard, Defendants, Rutgers, The State University of New Jersey and Barry Levin, M.D. ("Defendants"), will move before the United States District Court for the District of New Jersey, for an Order to enforce the settlement reached by the Parties and to have Plaintiff execute the Agreement provided by counsel for Defendants with Confidentiality and No-Rehire provisions attached as Exhibit F to the Certification of John K. Bennett.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendants will rely upon their Memorandum of Law, Certification of John K. Bennett, Esq. and exhibits, and Proposed Form of Order appended thereto.

**PLEASE TAKE FURTHER NOTICE** that Defendants request oral argument if this motion is opposed.

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By: s/ John K. Bennett  
John K. Bennett  
Robyn L. Aversa

Dated: February 29, 2024  
4890-0408-9769, v. 1